Author: Siddhartha Harsh Wardhan
ORCID: 0009-0005-4228-1124 (**universal case identifier: NAIH, Ombudsman, Hungarian Administrative Court, and Hungarian Accreditation Committee**): Linked to **zendo** (publication site) and indexed into **Open AIRE**

Digital Analytic Evidence of Institutional Silence: Accountability of University Officials and External Oversight Regulators

Seventy Professors, Zero Rebuttals in a Hungarian Medical University Case

Harsh Wardhan, Siddhartha, Seventy Professors, Zero Rebuttals: Institutional Silence and Accountability in Higher Education (August 30, 2025). Available at SSRN: https://ssrn.com/abstract=5420914 or http://dx.doi.org/10.2139/ssrn.5420914

Abstract

This article presents updated *digital analytic evidence of institutional awareness* and silence in a whistleblower case from *Hungarian medical education.* It supplements earlier case-study work on administrative obstruction at Semmelweis University and the role of the *Commissioner for Fundamental Rights*. It follows an initial institutional-awareness paper that relied mainly on first-wave analytics from midsummer 2025. Here, ***second-wave data from late 2025—weekly ResearchGate statistics, SSRN distribution metrics, and ORCID indexing***—are used to show how university officials and external oversight regulators continued to monitor detailed whistleblower case studies while taking no publicly documented corrective action.

Between ***August 2 and November 25, 2025*****,** publications on administrative obstruction, educational rights, and ***cross-border oversight received hundreds of reads from Hungary***. More than seventy of these reads came from professor-level accounts affiliated with Semmelweis University, alongside additional traffic from national oversight institutions and foreign universities. Weekly analytics for late ***November 17 -23, 2025,*** show renewed, concentrated bursts of domestic readership while the university-maintained silence, the Dean's Office demanded the removal of the studies from academic platforms, and the Ombudsman's Directorate for Equal Treatment attempted to block further email submissions.

The article argues that such patterns of ***'awareness without review'*** constitute a measurable form of institutional silence that regulators and accreditation agencies should treat as probative evidence. Digital platform metrics show that universities and regulators are not ignorant of well-documented allegations; they are choosing not to act. The Semmelweis case illustrates how scientific literacy and legal responsibility can diverge—and how whistleblowers and regulators can use digital analytics to close that gap.

Introduction: Digital Awareness, Institutional Silence

Earlier papers in the ***Administrative Obstruction in EU Medical Education I - VI*** series reconstructed how unwritten rules, overcrowding, inadequate laboratory resources and selective enforcement of internal regulations at Semmelweis University created structural barriers for international medical students, especially those enrolled under FM/CV status.[1] A parallel series, ***Gatekeeper of Rights I–II*****,** analyzed how the Hungarian Commissioner for Fundamental Rights shifted from substantive human-rights inquiry to procedural termination, closing Ombudsman **Case EBF–AJBH–309–2025** on a postal technicality while the underlying dispute remained unresolved.[2]

https://orcid.org/0009-0005-4228-1124 link is an official repository for evidence, including documents like 'Administrative Obstruction in the EU Medical Education,' 'Denied Access to the Scalpel,' 'Specimen Deficiency Report,' 'Gatekeeper of Rights I–II,' NAIH Data Breach filings, and SSRN DOIs. *Zendo indexes evidence from SSRN—ResearchGate to OpenAIRE—used by EU analysts for Hungary's Rule of Law Report, due in mid-2026.*

Those works documented emails, internal decisions, court filings, and formal threats. [3] They strongly suggested that the university and national bodies knew about the whistleblower case but relied on silence, delay, and narrow legal formalism to avoid confronting its implications. However, they treated institutional awareness primarily as an inference from correspondence and procedural behavior.

In 2025, an additional source of information became available: digital analytics from scholarly platforms. As the Semmelweis case studies were distributed across SSRN, Zenodo, ResearchGate, and ORCID, each platform began to generate statistics about who was reading them. From those countries, and under which institutional affiliations. [4]

> "These data reveal something that traditional paper trails cannot: the internal patterns of scholarly consumption within the very institution under investigation".

1.1 Purpose and contribution of this updated paper

This article is an updated, **data-driven supplement to the earlier institutional-awareness study and to *Gatekeeper of Rights II***. The previous work relied mainly on **first-wave analytics** from **July 17 to August 17 21, 2025,** when the case studies were first uploaded, and an initial cluster of Semmelweis-affiliated readers appeared. [5]

The present paper adds a **second wave of digital evidence from November 17 to 23, 2025**. It analyzes two distinct bursts of platform activity—mid-summer and late autumn—to demonstrate how Semmelweis faculty and external regulators continued to monitor the whistleblower publications while:

> Failing to restore denied educational rights.
> Attempting to force the removal of the studies from academic platforms and using procedural devices to terminate or narrow oversight investigations. [6]

The **paper's central claim is uncomfortable but straightforward: in a world of persistent digital metrics,** universities and regulators cannot plausibly claim they 'did not know' about allegations when their own staff have been repeatedly reading detailed case studies for months. Digital analytics transform institutional silence from a subjective complaint into an objectively measurable pattern.

2 Methods: Digital Metrics as Evidence of Institutional Awareness

2.1 Data sources and collection

This study draws on four categories of digital evidence.
First, it uses ResearchGate profile statistics for the author's account, including weekly "stats reports" and cumulative "reads by country/institution" tables. These reports record total reads, reads from Hungary, and—where available—reads attributed to accounts affiliated with Semmelweis University, broken down by seniority (eg, "Professor", "PhD student"). The same metrics are already referenced in earlier case-study work on educational rights and administrative obstruction. [7]
Exhibit A:

https://orcid.org/0009-0005-4228-1124 link is an official repository for evidence, including documents like 'Administrative Obstruction in the EU Medical Education,' 'Denied Access to the Scalpel,' 'Specimen Deficiency Report,' 'Gatekeeper of Rights I–II,' NAIH Data Breach filings, and SSRN DOIs. *Zendo indexes evidence from SSRN—ResearchGate to OpenAIRE—used by EU analysts for Hungary's Rule of Law Report, due in mid-2026.*

Secondly, the analysis uses SSRN author-dashboard data to confirm the distribution status, view counts, and download counts of key whistleblower papers in the ***Administrative Obstruction*** **and** ***Gatekeeper of Rights*** **series**.[8] These include, in particular, the integrated legal case study, the anatomy-access dossier, the ***NAIH data-breach paper***, and the cross-border QA submissions cited in **Administrative Obstruction in the EU medical education VI** of the series.[9]

Thirdly, ORCID and repository indexing records are used to verify that these papers have been assigned persistent identifiers (DOIs) and archived in multiple scholarly repositories (SSRN, Zenodo, ResearchGate, OpenAIRE). The ***ORCID record (0009-0005-4228-1124)*** functions as a master index linking the core case-study outputs: ***Administrative Obstruction in EU Medical Education***, ***Denied Access to the Scalpel***, ***Educational Rights and Whistleblower Protection***, ***Oral Exams Without Standards***, **the** ***Cross-Border Acknowledgment*** **trilogy, and** ***Gatekeeper of Rights I–III*****.**[10]

Fourthly, the study cross-references national and EU-level correspondence in which these publications are explicitly acknowledged: the **NAIH ex officio data-protection investigation (J-427-3/2025)**, the **Ombudsman and Equal-Treatment filings (EBF–AJBH–309–2025), MAB registration MAB/477-4/2025,** and the **European Commission's response in Complaint No 86019.**[11] This triangulation allows digital readership metrics to be situated within a documented chain of legal and accreditation proceedings rather than treated as platform-level data in isolation.

2.2 Scope and limitations

The analysis is descriptive rather than inferential. Digital metrics are used to establish patterns of exposure and awareness—who accessed the whistleblower case studies, from which countries and institutions, and during which weeks—not to attribute motives or internal decision-making to specific individuals.

ResearchGate, SSRN, and ORCID provide aggregated information, including country, institution, and self-reported seniority. They do not disclose IP addresses or personal identities in public analytics. Therefore, references in this paper to "more than seventy professors at Semmelweis University" refer to the number of profile accounts labeled as "Professor" and affiliated with Semmelweis University in platform statistics during the relevant period, as summarized in Administrative Obstruction of the EU medical education VI and in the ***Cross-Border Acknowledgment*** **1- III series.** [12]

The metrics also capture only engagement on the specific platforms examined. Additional reading—for example, via direct PDF circulation, institutional repositories, or printed copies—is not visible in these datasets. Consequently, the figures reported here should be treated as conservative minima, indicating at least the documented level of institutional awareness.

Finally, digital evidence is interpreted alongside the existing legal and procedural record. Where earlier papers already document silence, delay, or procedural termination by Semmelweis University, the Ombudsman, NAIH, and MAB, this article treats renewed waves of internal reading—without corresponding corrective action—as reinforcing evidence of "awareness without review", rather than as a stand-alone dataset. [13]

Exhibit A: Research Gate Analytical Statistical Data Second Wave

Author: Siddhartha Harsh Wardhan
ORCID: 0009-0005-4228-1124 (**universal case identifier: NAIH, Ombudsman, Hungarian Administrative Court, and Hungarian Accreditation Committee**): Linked to **zendo** (publication site) and indexed into **Open AIRE**

Empire's Mirror: How Foreign Lobbies and Billionaire Myths Shape America's False Democracy America Was Never a Democracy -Part II
Expired

+4 0
Views of your Spotlight New reads of your research
Total stats for this Spotlight: 24 views and 0 reads

Your most read research

Show all

Does anyone doing reserch in european educational law particularly in central to eastern region let know if similar topics ?
Question Aug 2025
Ask another question

+13
Reads

https://orcid.org/0009-0005-4228-1124 link is an official repository for evidence, including documents like 'Administrative Obstruction in the EU Medical Education,' 'Denied Access to the Scalpel,' 'Specimen Deficiency Report,' 'Gatekeeper of Rights I–II,' NAIH Data Breach filings, and SSRN DOIs. *Zendo indexes evidence from SSRN—ResearchGate to OpenAIRE—used by EU analysts for Hungary's Rule of Law Report, due in mid-2026.*

Author: Siddhartha Harsh Wardhan
ORCID: 0009-0005-4228-1124 (**universal case identifier: NAIH, Ombudsman, Hungarian Administrative Court, and Hungarian Accreditation Committee**): Linked to **zendo** (publication site) and indexed into **Open AIRE**

Who Deported More? Measuring Removals, Returns, and Enforcement Priorities Across Presidential Administrations (2002–2025)
October 2025 · 16 Reads

+9 Reads — 4 Full-text reads

Gatekeeper of Rights II: Ongoing Investigation and Closure of a Whistleblower Case in Hungarian Higher Education without Justification
November 2025 · 8 Reads

+8 Reads — 4 Full-text reads

Cross-Border Acknowledgment of Academic Obstruction: A Case Study in Whistleblower Documentation and International Accreditation Monitoring
August 2025 · 9 Reads

+6 Reads — 4 Full-text reads

Evidence to contest Article 57 - Vague and deflective on July 14, 2025
August 2025 · 7 Reads

+6 Reads — 3 Full-text reads

View less

Reads by country

Hungary — +69 Reads

United States — +12 Reads

https://orcid.org/0009-0005-4228-1124 **link is an official repository for evidence, including documents like 'Administrative Obstruction in the EU Medical Education,' 'Denied Access to the Scalpel,' 'Specimen Deficiency Report,' 'Gatekeeper of Rights I–II,' NAIH Data Breach filings, and SSRN DOIs.** ***Zendo indexes evidence from SSRN—ResearchGate to OpenAIRE—used by EU analysts for Hungary's Rule of Law Report, due in mid-2026.***

Author: Siddhartha Harsh Wardhan
ORCID: 0009-0005-4228-1124 (**universal case identifier: NAIH, Ombudsman, Hungarian Administrative Court, and Hungarian Accreditation Committee**): Linked to **zendo** (publication site) and indexed into **Open AIRE**

Exhibit 1A – ResearchGate Weekly “Statistics Overview” (17–23 November 2025) – Second-Wave Institutional Monitoring. The ResearchGate statistics for the author’s profile during the week ending 23 November 2025 indicate a total of +107 reads, accompanied by a +6.4 increase in the RI Score. The “Reads by Country” section shows 69 reads from Hungary, 12 from the United States, and 1 from Switzerland. The “Reads by Institution” section attributes 49 reads to Semmelweis University, Budapest, and 1 to the University of Zurich. The “Reads by Seniority” section reports 46 reads from accounts designated as “Professor” and 4 from “PhD Student,” which confirms that most of the engagement during this period originated from senior academic personnel at Semmelweis University. This snapshot from November should be considered alongside the analytics data from August 2025, as presented in "Seventy Professors, Zero Rebuttals," which documented the initial wave of institutional monitoring involving at least ninety-three Semmelweis professors.

https://orcid.org/0009-0005-4228-1124 link is an official repository for evidence, including documents like 'Administrative Obstruction in the EU Medical Education,' 'Denied Access to the Scalpel,' 'Specimen Deficiency Report,' 'Gatekeeper of Rights I–II,' NAIH Data Breach filings, and SSRN DOIs. *Zendo indexes evidence from SSRN—ResearchGate to OpenAIRE—used by EU analysts for Hungary's Rule of Law Report, due in mid-2026.*

Author: Siddhartha Harsh Wardhan
ORCID: 0009-0005-4228-1124 (**universal case identifier: NAIH, Ombudsman, Hungarian Administrative Court, and Hungarian Accreditation Committee**): Linked to **zendo** (publication site) and indexed into **Open AIRE**

3 Findings: Two Waves of Institutional Monitoring

3.1 First wave – July–August 2025: discovery and internal circulation

The findings in this section build directly on the author's earlier institutional-awareness study, ***Seventy Professors, Zero Rebuttals: Institutional Silence and Accountability in Higher Education***, which analyzed **midsummer 2025 ResearchGate statistics and documented the** first wave **of internal monitoring**—at least ninety-three professor-level accounts at Semmelweis University reading the whistleblower case studies by the end of August 2025, with no formal rebuttal or review.[1] This earlier paper established the baseline pattern: high levels of internal engagement paired with institutional silence. The present article updates that analysis with **second-wave digital evidence** from November 2025 and situates both waves within the broader legal and accreditation record, using Exhibits 1A and 1B to show how institutional monitoring resumed precisely when external pressure and procedural resistance peaked. The first visible wave of institutional engagement began shortly after the initial Semmelweis case-study papers were uploaded to SSRN and synchronized to ResearchGate in July 2025. Early profile statistics from late July already showed **18 reads from Hungary**, including **four reads from Semmelweis University** and four professor-level readers, even though the whistleblower series had only just been released. [14]

By **August 10, 2025**, the ***Institutional Awareness Log***—prepared as an appendix to the author's broader case-study series—recorded **131 total reads**, with **+58 reads in a single week** and **26 per cent of readers identified as faculty**. The same log documents that a named anatomy lecturer, Andrea Dorottya D Székely, appeared in the ResearchGate reader panel as a full-text reader of the principal Semmelweis case report, confirming that specific staff members had accessed the material.[15]

Two further snapshots from **August 19** and **August 29, 2025,** show that this initial engagement was not transient curiosity but the beginning of sustained internal monitoring. On August 19, 2025 profile statistics list **158 reads from Hungary**, of which **96 are attributed to Semmelweis University**, with **93 readers classified as "Professor"**.[16] By August 29, those figures had risen to **219 reads from Hungary**, **107 from Semmelweis University**, and **103 professor-level accounts**, indicating that more than seventy professors had engaged with at least one of the whistleblower publications during the early phase of the legal proceedings.[17]

This first wave coincided with the main escalation of the Semmelweis case to national oversight bodies. The comprehensive Part VI report on *Administrative Obstruction in EU Medical Education* was finalized during this period, documenting FM/CV discrimination, degraded anatomical specimens, GDPR breaches, and failures in systemic remedies, and explicitly citing the same ResearchGate metrics as evidence of institutional awareness.[18] The

https://orcid.org/0009-0005-4228-1124 link is an official repository for evidence, including documents like 'Administrative Obstruction in the EU Medical Education,' 'Denied Access to the Scalpel,' 'Specimen Deficiency Report,' 'Gatekeeper of Rights I–II,' NAIH Data Breach filings, and SSRN DOIs. *Zendo indexes evidence from SSRN—ResearchGate to OpenAIRE—used by EU analysts for Hungary's Rule of Law Report, due in mid-2026.*

Ombudsman's office also held an in-person meeting with the complainant in early August, before later terminating the case on a postal technicality.[19]

Taken together, these data show that, already by late August 2025, the Semmelweis faculty were not merely aware in the abstract that "a case" existed. They had **actively read** detailed case studies, including legal analysis, documentary exhibits, and proposed remedies. Institutional silence after this point therefore reflects a conscious choice not to engage with content that had demonstrably reached the desks—and screens—of senior academics.

3.2 Second wave – November 2025: renewed attention, continuing omission

A second, sharper wave of internal and domestic engagement occurred several months later. ResearchGate's **weekly stats report for 17–23 November 2025** records:

- **107 total reads** across the author's research.
- **69 reads from Hungary**.
- **49 reads attributed to Semmelweis University (Budapest)**; and
- **46 reads by accounts marked "Professor" and four by "PhD student"**.[20]

This snapshot demonstrates concentrated engagement within the respondent institution over a single week, when the initial controversy was no longer new, and most Semmelweis-specific papers had already been indexed for several months. A follow-up report for the **week ending November 30, 2025,** shows a further **37 reads**, including **26 from Hungary**, indicating that domestic attention continued beyond the initial spike. [21]

Crucially, this second wave coincided with a period of **heightened procedural tension**:

- The **National Authority for Data Protection and Freedom of Information (NAIH)** had opened ex officio case J-427-3/2025 into Semmelweis's handling of student data and correspondence.[22]
- The **Dean of the Faculty of Medicine** had issued Formal Notice No 83099-16/AOADH/2025, demanding the removal of all whistleblower studies from ResearchGate and "other platforms" because they portrayed the university in a negative light, without citing any specific legal norm or factual inaccuracy.[23]
-
- The **Ombudsman's Directorate for Equal Treatment** had sent an email stating that the Authority would "not conduct official correspondence with clients in ongoing cases via email" and instructing the complainant to use only Ügyfélkapu/E-papír, effectively cutting off the most accessible communication channel while still noting that the case file consisted solely of the complainant's submissions.[24]

During this same period, the *Gatekeeper of Rights II* paper—detailing procedural breakdown, premature case closure, and retaliation via the Dean's takedown demand—was accepted and distributed on SSRN, further increasing international visibility.[25]

https://orcid.org/0009-0005-4228-1124 link is an official repository for evidence, including documents like 'Administrative Obstruction in the EU Medical Education,' 'Denied Access to the Scalpel,' 'Specimen Deficiency Report,' 'Gatekeeper of Rights I–II,' NAIH Data Breach filings, and SSRN DOIs. *Zendo indexes evidence from SSRN—ResearchGate to OpenAIRE—used by EU analysts for Hungary's Rule of Law Report, due in mid-2026.*

The November analytics, therefore, depict a university and an oversight apparatus that are **closely monitoring** the whistleblower's work at the very moment they are formally insisting that legal channels have been exhausted or must be rerouted through more restrictive procedures. The renewal of internal reading, months after the first wave, undermines any suggestion that earlier engagement was a short-lived anomaly or limited to a small group of curious staff.

When set against the continued absence of documented corrective action—no restoration of denied anatomy access, no audit of overcrowded facilities, no transparent review of FM/CV enforcement—the second wave of digital evidence supports a stronger conclusion: **institutional inaction is not a product of ignorance but of deliberate omission**. The university and regulators knew, or ought to have known, the scale and detail of the allegations; they chose to respond with takedown threats, procedural closure, and silence.

4 Institutional Science Without Accountability

4.1 Monitoring without engagement

Universities present themselves as communities of inquiry in which documented evidence, once circulated, triggers scholarly engagement and, where appropriate, institutional self-correction. The Semmelweis case reveals a different pattern. By late August 17- 23, 2025, ResearchGate data already showed that more than seventy professor-level accounts affiliated with Semmelweis University had read at least one of the whistleblower case studies.[26] At the same time, the author's integrated ***Administrative Obstruction in the EU medical education series I – VI*** dossier demonstrated breaches of the university's own Study and Examination Regulations (SZMSZ) and of ESG and WFME standards on non-discrimination, assessment validity, resource adequacy, and information management.[27]

If the institution had treated these papers as scientific contributions rather than reputational threats, the expected response would have been some form of substantive engagement: a departmental meeting, an internal audit, a written rebuttal, or at least a public clarification of contested facts. ***No such engagement occurred, in reference to Gatekeepers of Rights II: Continuing Investigation and closure of a Whistleblower Case in Hungarian Higher Education without Justification, SSRN ID 5628170.*** Instead, the **only documented institutional reaction to the body of work was the Dean's Formal Notice No 83099-16/AOADH/2025**, which demanded the removal of "studies, materials, and other content related to Semmelweis University's educational activities" from ResearchGate and "other platforms", citing no specific legal basis and identifying no error of fact or law.

The **Ombudsman's conduct mirrored this dynamic at the level of external oversight**. After an in-person meeting on August 6, 2025, the Office of the Commissioner for Fundamental Rights terminated Case EBF–AJBH–309–2025 on the basis that a deficiency ruling had been returned "not claimed", despite the absence of any verified delivery or electronic notice.[29] When the complainant sought clarification by email, the Directorate for Equal Treatment responded that the Authority "does not conduct official correspondence with clients via email" and

instructed him to use Ügyfélkapu/E-papír, even while acknowledging that the case file consisted solely of the complainant's submissions.[30]

Viewed against the backdrop of the digital metrics, this behavior is difficult to reconcile with good-faith oversight. Internal and external actors were clearly **reading** the case studies; they were not ignoring them. Yet their formal actions consisted of procedural closure, channel restriction, and takedown demands—not reasoned engagement with the underlying evidence. In effect, Semmelweis University and the Ombudsman's Office treated the whistleblower's work as an intelligence feed to be monitored for risk management, not as a scholarship to be answered.

4.2 Tension with ESG Standards and EU Charter Guarantees

The Semmelweis case reveals a direct conflict between the university's practices and both European quality assurance standards and fundamental EU legal guarantees. In particular, documented actions by the institution breached key **European Standards and Guidelines (ESG)** – notably **ESG 1.3** (which demands valid, fair assessment practices), **ESG 1.6** (requiring adequate learning resources and student support), and **ESG 1.7** (calling for transparent, consistent information management) – even as they infringed corresponding rights under the **EU Charter of Fundamental Rights** (Articles 14, 21, 41, and 47). The university's failure to ensure equitable treatment and effective remedies for students thus creates a dual compliance problem: it undermines both the educational quality benchmarks set by ESG/WFME and the legal standards enshrined in EU law. This tension transforms what might seem an academic dispute into a **legal and quality-assurance conflict** of systemic importance.

Breaches of QA Standards: The factual record demonstrates several deviations from ESG obligations. ESG 1. 1.3 obliges institutions to provide *student- centered learning, teaching, and assessment*, meaning assessments must be conducted fairly and supported by proper preparation and appeals mechanisms. In stark contrast, the complainant was **denied lawful access** to a compulsory anatomy laboratory essential for his coursework and final examination, a decision that directly compromised the fairness and validity of his assessment. ESG 1. 6 mandates that adequate resources and support be available for learning. However, the case revealed *resource insufficiencies*, including **overcrowded or makeshift laboratory facilities** and degraded anatomical materials, which impeded the student' s learning outcomes. Such deprivation of essential laboratory experience not only violates educational standards but also infringes upon the student's **right to education** under Article 14 of the Charter.

Furthermore, ESG 1:7 requires **transparent and consistent information management**. Nonetheless, the university's communications were marred by contradictions and silence – for example, providing unclear or last-minute procedural instructions and subsequently failing to respond to the student's queries and appeals. This opacity and inconsistency amount to an institutional failure of transparency, constituting a breach of the **right to good administration** guaranteed by Charter Article 41. Collectively, these shortcomings illustrate how non-compliance with ESG standards and mismanagement of student rights are interconnected. Indeed, an independent analysis has concluded that practices such as unequal access to

laboratories, extra-statutory "FM/CV" re-registration rules, and unstructured oral examinations *undermine fair access and valid assessment,* thereby violating ESG requirements concerning assessment fairness and resource adequacy. Such practices also introduce elements of discrimination-disproportionately affecting international students- and hinder the provision of meaningful remedies, thereby engaging Charter Articles 21 (non-discrimination) and 47 (effective remedy) simultaneously.

Implicated EU Charter Rights: The **Charter of Fundamental Rights of the EU** provides a legal backdrop that magnifies these quality assurance breaches into fundamental rights concerns. Article 21 (non-discrimination) is called into question by indications that **international students bore a disproportionate burden** of the university's resource shortfalls and ad hoc rules. In this case, attrition and complaint data suggest foreign students were more likely to be denied opportunities or subjected to "extra-textual" requirements, reflecting a form of indirect discrimination contrary to EU norms. Article 41 (right to good administration) was likewise violated by the prolong**ed administrative silence and procedural missteps**: for months, the university and oversight bodies failed to issue timely, reasoned decisions or to serve notices, as required by law. Perhaps most salient is Article 47 – the right to an effective remedy and fair trial – which was systematically frustrated. The student's attempts to seek redress (through internal appeals, ombudsman petitions, data protection complaints, and court filings) were met with either silence or ***retaliatory measures*** rather than a fair hearing. Notably, after the student lodged formal complaints, the university issued a **takedown demand** in mid-October 2025 to censor a published account of the case – an act of retaliation occurring just **four days after** the national data protection authority acknowledged the student's filing. This sequence (authorities' acknowledgment followed by an adverse action against the complainant) exemplifies how a lack of good faith engagement can escalate a matter into the realm of fundamental rights: the takedown not only impaired the student's academic freedom and whistleblower protections under Hungarian law, but also effectively penalized him for seeking a remedy, thus chilling the exercise of Charter Article 47 rights. In summary, the university's pattern of non-response, obfuscation, and reprisal created a procedural dead end for the student – precisely the kind of outcome the Charter forbids in administrative processes. As one EU-level review noted, once **internal bodies fail to uphold** these core rights to non-discrimination, good administration, and effective remedy, "the matter is no longer purely domestic," since such failures implicate the Union's fundamental values and rule-of-law oversight.

Oversight and the PIPER Model: Paradoxically, even as these violations unfolded, various oversight and accreditation bodies became aware of the situation – yet their awareness did not immediately translate into enforcement. The **Hungarian Accreditation Committee (MAB)**, for instance, formally recorded the complaint (Reg. No. *MAB/477-4/2025*) in its accreditation case file. This means the case has been entered into the **WFME-linked review cycle**, signaling that Hungary's compliance with international medical education standards is under scrutiny. Likewise, the **National Authority for Data Protection and Freedom of Information (NAIH)** opened an investigation (Case *J-427-3/2025*) into the university's handling of student data and procedural fairness. At the European level, the **European Commission** acknowledged *Complaint No. 86019* on July 8, 2025, explicitly recognizing the potential breach

of EU law and even warning of a "systemic failure to comply with EU law by public authorities" if the allegations proved true. Each of these steps represents an official *confirmation* of the problem: national and EU bodies have effectively **put the university on notice** that its conduct may be in violation of accreditation standards and EU rights. However, the mere existence of filings and acknowledgments has so far yielded little corrective action – a dynamic captured by the *Passive Institutional Perceptive Engagement Record (PIPER)* model developed in the Cross-Border Acknowledgment research. Under the PIPER paradigm, institutions and regulators *perceive, document, and even formally acknowledge* complaints, yet **remain passively engaged** – taking no substantive steps unless externally compelled. In the Semmelweis matter, despite MAB docketing the case and NAIH and the Commission signaling concern, the on-the-ground situation remained essentially unchanged for months. This *regulatory awareness without enforcement* undermines the very purpose of both the EU's administrative law safeguards and the accreditation system's quality assurances. It renders the student's protected disclosures and petitions "inert metadata" – logged in databases but not acted upon – thereby eroding trust in oversight mechanisms. The PIPER model thus explains how a **failure** by quality assurance agencies and authorities to act can **de facto nullify** the ESG and Charter frameworks: rules and rights are acknowledged on paper, yet negated in practice. Such inertia is especially detrimental in the higher education context, where timely intervention is often needed to prevent irreparable harm to students' academic progress and rights.

Impact on Students and Recognition Systems: The consequences of these breaches are both personal and systemic. At the individual level, the complainant suffered concrete educational harm: barred from critical lab training, he was left at a severe disadvantage in mastering course material and performing in examinations. His final anatomy exam – covering precisely the hands-on competencies he was prevented from practicing – was inherently unfair, casting doubt on the validity of the assessment outcome. Other students reportedly faced similar **arbitrary obstacles** (such as sudden "signature" revocations or re-registration demands) with no apparent justification, indicating a pattern of **rights deprivation** that extends beyond a single case. These student-level harms exemplify how deviations from ESG standards can translate into lost learning opportunities, unequal treatment, and delayed progression or attrition – effects that strike at the heart of Article 14's guarantee of education and Article 21's guarantee of equal access. Beyond the individual, there is a broader **accreditation and recognition risk**. The quality of modern medical education is monitored not only locally but also through international frameworks such as WFME. Hungary's medical accreditation authority (MAB) must meet WFME's criteria to ensure Hungarian medical degrees are recognized abroad (for example, for graduates seeking licensure in other countries). By **including the Semmelweis case in its records**, MAB has effectively flagged the university's non-compliance with standards for fair assessment, resource sufficiency, and governance integrity. Observers have noted that such **systemic administrative failings "endanger… alignment with WFME standards and could impact the international recognition" of the university's degrees**. In plain terms, if issues like those documented – discriminatory access rules, substandard teaching conditions, and lack of transparency – remain uncorrected, they could **undermine confidence in the institution's qualifications** beyond Hungary's borders. This would harm not only current students but also alumni and the national education reputation, as foreign accrediting bodies and partners (e.g.

ECFMG/FAIMER in the United States) might question the school's credibility. Indeed, the evidence submitted through the "Administrative Obstruction" and "Cross-Border Acknowledgment" dossiers has already been shared with international regulators and partners, prompting inquiries that span from **Ireland's DFHERIS** (education ministry) to the **ECFMG** (which certifies international medical graduates). In sum, the fallout from these ESG and Charter breaches is **twofold**: students lose out on their rights and educational quality, and the institution faces loss of trust in the **cross-border recognition** of its programs. As one report succinctly put it, such failures "harm student progress, weaken the legitimacy of medical qualifications, and diminish trust in the EU's mobility and recognition systems".

Legal-Quality Assurance Nexus: This section underscores that the problems at Semmelweis University are not just academic quirks or isolated lapses – they represent a **convergence of legal and quality assurance violations**. European higher education policy treats student rights and educational standards as mutually reinforcing, and compliance with ESG/WFME criteria often fulfills underlying legal obligations, and vice versa. When a university flouts those standards, it simultaneously risks violating the law. Here, the *tension* is evident: institutional autonomy and opacity collided with European norms, resulting in harm that triggered responses from accreditation bodies and EU institutions alike. The case thus highlights the need for **robust enforcement** of both QA standards and fundamental rights. Without such enforcement, institutions may continue to receive EU funds or enjoy Erasmus partnerships on paper yet fail to uphold the corresponding duties to students in practice. The Semmelweis episode has already prompted calls for intervention by EU authorities, given that national mechanisms proved inadequate to safeguard the students' rights. In a rule-of-law-abiding system, **neither quality standards nor rights guarantees can be treated as optional**. Upholding ESG 1.3, 1.6, 1.7, and WFME benchmarks is not merely a bureaucratic requirement but a condition for lawful, high-quality education – one that protects students' fundamental rights to equal treatment, good administration, and effective redress. Where those intertwined obligations are breached, as here, the conflict must be resolved in favor of restoring compliance. The integrity of Europe's higher education area depends on it.

5 Implications for Regulators, Accreditors, and Whistleblowers

5.1 Oversight bodies and ombuds institutions

For domestic oversight bodies, digital analytics provide a simple yet powerful tool for assessing whether a university has meaningfully engaged with allegations. In the Semmelweis case, platform data show that senior staff had multiple opportunities to review the whistleblower case studies: first in the July–August wave of internal reading; then again in the concentrated November spike.[40]

In circumstances where an ombuds institution closes an investigation on procedural grounds—such as a returned postal notice—despite clear evidence of alternative contact channels and ongoing digital engagement with the underlying material, courts and higher-level bodies should treat that closure as **prima facie deficient**. As ***Gatekeeper of Rights II*** **documents**, the

Hungarian Ombudsman terminated Case EBF–AJBH–309–2025 without addressing the merits, even after the complainant submitted a confirmatory postal letter and multiple emails referencing the ResearchGate readership data and the subsequent Dean's takedown threat.[41]

In the future, ombuds offices should, at a minimum:

1. request platform statistics where a complainant has published case studies or reports in citable form.
2. record those statistics in the case file; and
3. Treat prolonged institutional silence after documented awareness as evidence of **administrative omission** under general administrative procedure rules.[42]

Where a national ombuds institution is itself implicated in procedural gatekeeping, supranational bodies—such as the European Commission under the Rule-of-Law Report process—should consider digital metrics as corroborating evidence that domestic remedies are ineffective in practice.[43]

5.2 Accreditation and quality-assurance agencies

Accreditation and recognition agencies (for example, MAB, WFME, FAIMER, and ECFMG) routinely receive institutional submissions that portray national systems as compliant with ESG and WFME standards. The Semmelweis dossier and the *Cross-Border Acknowledgment* series illustrate how whistleblower publications can provide an alternative evidence stream.[44]

When digital metrics show that:

- Whistleblower case studies are formally indexed (with DOIs and ORCID links);
- They have been widely read inside the respondent institution, and
- domestic oversight bodies have nonetheless taken no corrective action,

Then accreditation agencies should not simply defer to institutional self-assessment. Instead, they should:

- Ask whether the institution has opened any **documented internal review** in response to the case studies.
- Request copies of any internal or external evaluations that address the substance of the allegations; and
- Treat the absence of such documentation—despite extensive internal readership—as a red flag for compliance with ESG 1.1, 1.3, and 1.7.[45]

Part VI of the *Administrative Obstruction* series characterizes the interaction between Semmelweis and external bodies as "self-referential oversight", in which QA agencies accept the institution's own assertions about FM/CV status, resource adequacy, and assessment standards, even when those assertions are contradicted by case-study evidence and by students' lived

experience.[46] Digital analytics sharpen that critique: they show that accreditors are not merely missing information; they are **choosing to ignore a parallel evidence base** that the institution itself has been monitoring for months.

5.3 Practical guidance for whistleblowers

> **For would-be whistleblowers in higher education, the Semmelweis case suggests a concrete digital strategy.**

First, allegations should, wherever possible, be converted into **structured, citable case studies**. The *Administrative Obstruction* series shows how to tie specific experiences—denial of lab access, non-standard oral exams, GDPR breaches—to named legal norms (national higher-education law, general administrative procedure, ESG, WFME, EU Charter).[47]

Secondly, those case studies should be **published on multiple scholarly platforms** (SSRN, Zendo, ResearchGate) and linked via an ORCID record. This ensures persistence and facilitates discovery by external regulators, law libraries, and academic colleagues, even if a later platform faces takedown pressure.[48]

Thirdly, whistleblowers should **systematically archive platform analytics**—weekly stats, reads by country and institution, and changes over time. In the Semmelweis dossier, the *Institutional Awareness Log* and subsequent weekly PDFs allowed the author to show that more than seventy professor-level readers at the respondent university had engaged with the material, and that a second wave of domestic reading occurred during the period of most intense procedural resistance.[49]

At the same time, whistleblowers must respect **data-protection and confidentiality limits**. Where the underlying facts involve patients, clinical records, national security information or other categories of sensitive data, EU law requires that any disclosure comply with Regulation (EU) 2016/679 (GDPR) and sectoral secrecy rules. In practice, this means publishing only what is strictly necessary to demonstrate the illegality or systemic problem; anonymizing or pseudonymizing all personal data that is not essential; and redacting the names of private individuals unless their identity is already public or they are acting in an official capacity (for example, rectors, deans, ombuds staff, or ministers). The EU Whistleblower Protection Directive allows disclosure of breaches of Union law, but protection is conditional on good faith reporting and on handling personal data in accordance with the GDPR; similarly, the Trade Secrets Directive expressly preserves disclosures made to protect the public interest.[47]

Finally, when communicating with courts, ombuds offices, and QA agencies, whistleblowers should **distinguish clearly between awareness and engagement**. Digital metrics can show that officials and staff have seen the material; the absence of rebuttals, internal reviews, or corrective action then becomes evidence of a deeper problem: institutional cultures that treat rights-based scholarship as a reputational threat rather than a trigger for self-correction.[50]

https://orcid.org/0009-0005-4228-1124 link is an official repository for evidence, including documents like 'Administrative Obstruction in the EU Medical Education,' 'Denied Access to the Scalpel,' 'Specimen Deficiency Report,' 'Gatekeeper of Rights I–II,' NAIH Data Breach filings, and SSRN DOIs. *Zendo indexes evidence from SSRN—ResearchGate to OpenAIRE—used by EU analysts for Hungary's Rule of Law Report, due in mid-2026.*

Author: Siddhartha Harsh Wardhan
ORCID: 0009-0005-4228-1124 (**universal case identifier: NAIH, Ombudsman, Hungarian Administrative Court, and Hungarian Accreditation Committee**): Linked to **zendo** (publication site) and indexed into **Open AIRE**

5.4 Why publishing matters for whistleblowers

Publishing is not only a technical question of platforms and DOIs; it is a survival question. Many whistleblowers are quietly isolated, pressured into "informal" resolutions, or pushed out of institutions without ever creating a stable record of what happened. Once they leave, memories blur, email accounts are closed, and documents are lost. Years later, they have no coherent narrative—only trauma, scattered screenshots and a reputation shaped by the institution that silenced them.

A structured publication changes that dynamic. A citable case study—factually accurate, ethically written, and grounded in named legal norms—becomes a **fixed point of reference**. It preserves dates, actors, exhibits, and legal context in one place. It gives the whistleblower something to point to for future employers or universities: *"This is what happened. Here are the documents. Here is how I responded—within the law, under GDPR and whistleblower rules, and without defaming anyone."* It is not just a legal artefact; it is a psychological anchor that protects against gaslighting and retrospective character assassination.

Publication also alters the behavior of **institutions and external oversight.** When allegations remain **inside closed complaint files, university officials, ombuds staff, and regulators know the odds are high that the case will die in a drawer**. When the same allegations are turned into a public, well-referenced paper on SSRN or a similar platform, everyone understands that **internal collusion now carries external risk**. Any attempt to misrepresent events, retaliate off the record, or bury correspondence sits next to a timestamped record that anyone can read. The message is simple: ***if you lie or stonewall, the paper will still be there.***

This is why it matters that the publication is done correct**ly**. Under the **GDPR and the EU Whistleblower Protection Directive,** a whistleblower is protected when they disclose unlawful practices or breaches of Union law, but they must handle personal data lawfully: **redact or anonymize patients, students and staff; limit naming to those acting in an official capacity** (rectors, deans, ministers, ombuds officials); and avoid including any clinical or security-sensitive information that is not necessary to demonstrate the breach. When those lines are respected, a whistleblower can invoke Article 11 of the Charter—freedom of expression and information—as a shield: they published matters of public interest, proportionately, through a scholarly outlet rather than through sensationalist social media.

Finally, publication signals that a case is **not an isolated, private grievance**, even if only one person is formally on the record. A single complainant with a documented, legally referenced case study has more visibility than a dozen students who only whisper in corridors. Institutions know that; it is why they are more comfortable with private complaints than with public, citable analysis. A whistleblower who publishes within legal and ethical bounds is not just "complaining"—they are documenting how the system failed, who failed to act, and when. That record makes it harder for the next official to pretend nothing happened.

https://orcid.org/0009-0005-4228-1124 link is an official repository for evidence, including documents like 'Administrative Obstruction in the EU Medical Education,' 'Denied Access to the Scalpel,' 'Specimen Deficiency Report,' 'Gatekeeper of Rights I–II,' NAIH Data Breach filings, and SSRN DOIs. *Zendo indexes evidence from SSRN—ResearchGate to OpenAIRE—used by EU analysts for Hungary's Rule of Law Report, due in mid-2026.*

Author: Siddhartha Harsh Wardhan
ORCID: 0009-0005-4228-1124 (**universal case identifier: NAIH, Ombudsman, Hungarian Administrative Court, and Hungarian Accreditation Committee**): Linked to **zendo** (publication site) and indexed into **Open AIRE**

6 Conclusion

Digital analytics have turned what used to be a subjective allegation— "the university must know about this"—into something measurable. In the Semmelweis case, ResearchGate and SSRN data show two clear waves of institutional awareness: a first wave in July–August 2025, during which more than seventy professor-level accounts affiliated with Semmelweis University accessed the whistleblower case studies, and a second wave in November 2025, when a renewed burst of Hungarian and Semmelweis-specific reads coincided with the Dean's takedown notice, the Ombudsman's procedural closure, and NAIH's ex officio investigation.[51]

Across the same period, the formal behavior of institutions followed the pattern documented in ***Administrative Obstruction in EU Medical Education VI*** **and** *Gatekeeper of Rights II*: denial of compulsory educational access on unwritten grounds; examinations using degraded specimens; inconsistent FM/CV enforcement; GDPR breaches and public disclosure of student data; Ombudsman termination on a postal technicality; and a takedown demand that cited no legal norm while threatening disciplinary consequences for publishing anonymized case studies.[52]

The digital and procedural records, taken together, support three conclusions.

First, **institutional silence in this case cannot credibly be explained by a lack of knowledge**. Senior staff and oversight bodies demonstrably had access to detailed analyses of the problems at issue, including references to SZMSZ provisions, ESG/WFME standards, and EU Charter rights. Their continued inaction, therefore, represents a form of administrative omission rather than informational deficit.

Secondly, **awareness without review is itself a governance failure**. When institutions and regulators use digital platforms merely to monitor reputational risk, without triggering internal audits, written rebuttals, or corrective measures, they hollow out the guarantees of good administration and adequate remedy in Articles 41 and 47 of the EU Charter.[53].

Thirdly, **digital analytic evidence should now be recognized as part of the standard toolkit for rights protection in higher education**. Platform statistics can corroborate claims that universities and oversight bodies knew, or ought to have known, about systemic problems long before they chose to act—or chose not to act at all. For EU institutions monitoring rule-of-law conditionality, for accreditation agencies evaluating ESG compliance, and for courts assessing whether domestic remedies are effective in practice, such metrics provide a low-cost but powerful complement to traditional documentary records. [54]

The Semmelweis case is therefore more than a local dispute. It is an example of how digital traces can expose an emerging model of institutional behavior—**scientifically literate, legally informed, but strategically silent**—and of how those same traces can be used to rebuild accountability. Where analytics show that dozens of professors and regulators have repeatedly

https://orcid.org/0009-0005-4228-1124 link is an official repository for evidence, including documents like 'Administrative Obstruction in the EU Medical Education,' 'Denied Access to the Scalpel,' 'Specimen Deficiency Report,' 'Gatekeeper of Rights I–II,' NAIH Data Breach filings, and SSRN DOIs. *Zendo indexes evidence from SSRN—ResearchGate to OpenAIRE—used by EU analysts for Hungary's Rule of Law Report, due in mid-2026.*

read well-documented allegations, continued silence should be treated not as neutrality but as a decision, and a decision that can be judged against law, standards, and the public interest.

References

1. S H Wardhan, *Administrative Obstruction in EU Medical Education: A Legal Case Study from Semmelweis University* (SSRN preprint, 2025).
2. S H Wardhan, *Administrative Obstruction in European Union Medical Education VI: Systematic Discrimination and Administrative Failures in the EU Medical Program* (SSRN preprint, 2025).
3. S H Wardhan, *Containerised Anatomy—Evidence of Overcrowding in Hungarian Medical Education* (Administrative Obstruction Series VII, SSRN preprint, 2025).
4. S H Wardhan, *Administrative Obstruction in the EU Education: Case Study Evidence of Lack of Transparency and Equity (Part VI)* (SSRN preprint, 2025).
5. S H Wardhan, *Administrative Obstruction in EU Medical Education V: Procedural Silence and Compelled Response – Administrative Inaction in the Semmelweis Case (EBF–AJBH–309–2025)* (SSRN preprint, 2025).
6. S H Wardhan, *Denied Access to the Scalpel for Dissecting the Specimen: A Legal Case Study of Academic Obstruction at Semmelweis University* (SSRN/ResearchGate preprint, 2025).
7. S H Wardhan, *Educational Rights and Whistleblower Protection in Hungarian Medical Education: Evidence from a Central European Administrative Court Case* (SSRN preprint, 2025).
8. S H Wardhan, *Ghost Students: The Legal Fiction of FM and CV Status at Semmelweis University* (SSRN preprint, 2025).

https://orcid.org/0009-0005-4228-1124 link is an official repository for evidence, including documents like 'Administrative Obstruction in the EU Medical Education,' 'Denied Access to the Scalpel,' 'Specimen Deficiency Report,' 'Gatekeeper of Rights I–II,' NAIH Data Breach filings, and SSRN DOIs. *Zendo indexes evidence from SSRN—ResearchGate to OpenAIRE—used by EU analysts for Hungary's Rule of Law Report, due in mid-2026.*

9. S H Wardhan, *Semmelweis Legal Case Study & Whistleblower Evidence Packet – Appendices A–F* (internal legal packet, 14 July 2025).
10. Semmelweis University, *Organisational and Operational Regulations – Part III Student Standards – Chapter III.2 Study and Examination Regulations* (SZMSZ_HKR, English edn, 2024).
11. S H Wardhan, *Gatekeeper of Rights: The Role of Hungary's Commissioner for Fundamental Rights in Safeguarding Educational Equity* (Gatekeeper I, SSRN preprint, 9 August 2025).
12. S H Wardhan, *Gatekeeper of Rights II: Ongoing Investigation and Closure of a Whistleblower Case in Hungarian Higher Education without Justification* (SSRN ID 5628170, 2025).
13. S H Wardhan, *Gatekeeper of Rights III: Hungary's Higher Education Under EU Rule-of-Law Scrutiny* (SSRN working paper, 2025).
14. S H Wardhan, *Cross-Border Acknowledgment of Academic Obstruction: A Systemic QA Dossier on Access Denial, Policy Inconsistency, and Accreditation Risk* (SSRN ID 5454954, 7 September 2025).
15. S H Wardhan, *Cross-Border Acknowledgment III – The Crossword of PIPER: Passive Oversight and the Institutionalisation of Inaction* (SSRN working paper, 2025).
16. S H Wardhan, *Cross-Border Acknowledgment III – Accreditation-Record Evidence (MAB/477-4/2025) on QA/ESG Compliance at a Hungarian Medical School* (SSRN working paper, 2 November 2025).
17. S H Wardhan, *Seventy Professors, Zero Rebuttals: Institutional Silence and Accountability in Higher Education* (SSRN preprint, 2025).
18. S H Wardhan, *Digital Analytic Evidence of Institutional Silence: Accountability of University Officials and External Oversight Regulators* (SSRN/Zenodo preprint, 2025).
19. S H Wardhan, *Oral Exams Without Standards: A Case Study of Assessment Bias against International Medical Students in Central Europe* (SSRN preprint, 2025).
20. S H Wardhan, *False Affiliations and Institutional Misrepresentation: A Case Study of Dr. Alán Alpár and Semmelweis University* (SSRN preprint, 2025).
21. Act CCIV of 2011 on National Higher Education (Hungary).
22. Act CL of 2016 on General Administrative Procedure (Hungary).
23. Act XXV of 2023 on Complaints, Disclosures in the Public Interest and Whistleblower Protection (Hungary).
24. Act CXXV of 2003 on Equal Treatment and the Promotion of Equal Opportunities (Hungary).
25. Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Hungary).
26. Charter of Fundamental Rights of the European Union [2012] OJ C326/391.
27. Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation).
28. Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law.

29. Directive (EU) 2016/943 of the European Parliament and of the Council of 8 June 2016 on the protection of undisclosed know-how and business information (trade secrets) against their unlawful acquisition, use and disclosure.
30. European Association for Quality Assurance in Higher Education (ENQA), *Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG)* (3rd edn, Brussels 2015).
31. World Federation for Medical Education, *WFME Global Standards for Quality Improvement: Basic Medical Education* (2015/2020).
32. Council Implementing Decision (EU) 2022/2506 of 12 December 2022 on measures for the protection of the Union budget in relation to breaches of the principles of the rule of law in Hungary.
33. European Commission, *2022–2024 Rule of Law Reports – Country Chapter on the Rule of Law Situation in Hungary* (various years).
34. National Authority for Data Protection and Freedom of Information (NAIH), 'Notice Opening Ex Officio Investigation J-427-3/2025' (Budapest, 10 October 2025).
35. Hungarian Accreditation Committee (MAB), Secretariat email Reg. nr MAB/477-4/2025 to S H Wardhan (2–3 September 2025).
36. Office of the Commissioner for Fundamental Rights of Hungary (AJBH), Department for Equal Treatment email to Siddhartha Harsh Wardhan, ref EBF-AJBH-309-26/2025 (30 September 2025).
37. Semmelweis University, Faculty of Medicine, Formal Notice No 83099-16/AOADH/2025 (Prof Dr Péter Nyirady, 13–15 October 2025).
38. European Commission, DG Education, Youth, Sport and Culture, 'Reply to Complaint No 86019 – Administrative Obstruction at Semmelweis University' Ares(2025)5266848 (8 July 2025).
39. Department of Further and Higher Education, Research, Innovation and Science (DFHERIS, Ireland), acknowledgement email to Siddhartha Harsh Wardhan regarding Semmelweis whistleblower dossier (1 August 2025).
40. Educational Commission for Foreign Medical Graduates (ECFMG), Special Investigations Unit acknowledgment email to Siddhartha Harsh Wardhan re submission of Appendices A–F (22 July 2025).
41. Budapest Metropolitan Administrative and Labour Court, Order in case 7.Kpk.750.239/2025/2 (11 July 2025).
42. European Commission, 'Complaint about alleged breach of EU law by Hungary – Standard complaint form No 86019' (automatic confirmation, 30 June 2025).
43. C van Lierop, *Mechanism to Resolve Legal and Administrative Obstacles in a Cross-Border Context* (EPRS Briefing 625.147, European Parliamentary Research Service, November 2021).
44. N Athanasiadou and M Eliantonio, 'Silence of the EU Authorities: The Legal Consequences of Inaction by the EU Administration' in DC Dragos, P Kovac and HD Tolsma (eds), *The Sound of Silence in European Administrative Law* (Palgrave Macmillan 2020).
45. Council of the European Union, 'Forward Look' for the General Affairs Council hearing on Hungary under Article 7 TEU (Consilium, October 2025).

https://orcid.org/0009-0005-4228-1124 link is an official repository for evidence, including documents like 'Administrative Obstruction in the EU Medical Education,' 'Denied Access to the Scalpel,' 'Specimen Deficiency Report,' 'Gatekeeper of Rights I–II,' NAIH Data Breach filings, and SSRN DOIs. *Zendo indexes evidence from SSRN—ResearchGate to OpenAIRE—used by EU analysts for Hungary's Rule of Law Report, due in mid-2026.*

46. Semmelweis University, *Admission Rules 2023–2024* and *Admission Rules 2025–2026* (Registrar's Office, 2022 and 2024) (age-preference clause 'preferably under the age of 30').
47. Equal Opportunity Coordinator, Semmelweis University, email from Dr Balázs Horváth to Siddhartha Harsh Wardhan (26 June 2025).
48. Dr Ádám Becze, English Program Tutor, email to ICM course students (16 October 2024) (Hevesy hall overcrowding; QR attendance).
49. G Pusztai and others, 'Self-financing as a risk factor of attrition in Hungarian medical education' (2022) 22 *BMC Medical Education* 317.
50. LI Pernar and others, 'Impact of examiner bias in oral examinations' (2020) 219(2) *American Journal of Surgery* 222.
51. RA Abuzied, 'Effectiveness of structured and conventional methods of viva examination in medical education: a systematic review and meta-analysis' (2023) 23 *BMC Medical Education* 112.
52. S H Wardhan, NAIH Data-Breach Dossier J-427-3/2025, *Administrative Obstruction in the EU Education: Case Study Evidence of Lack of Transparency and Equity* Part VI (SSRN preprint, 2025).
53. S H Wardhan, *Over-Enrolled and Under-Served: Quantitative Evidence of Administrative Obstruction in EU Medical Education* (SSRN/Zenodo preprint, 2025).
54. S H Wardhan, 'Public Interest Disclosure and Whistleblower Evidence Chain for Case EBF–AJBH–309–2025' (secure submission via kibejelento.ajbh.hu, 5 July 2025; cross-posted appendix on SSRN, 2025).